



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
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January 2, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket Nos. 10-90, 14-58
Rate Floor - Valley Telephone Cooperative, Inc. (TX)
Study Area Code 442159

Dear Ms. Dortch:

On behalf of Valley Telephone Cooperative, Inc. (TX) ("Company"), JSI files the attached rate floor data and certifications pursuant to sections 54.313(h)(2) of the Commission's rules.¹ A copy has also been submitted to the Universal Service Administrative Company and the Texas Public Utility Commission. Company seeks confidential treatment for the line counts provided in the Rate Floor Data Collection Form and hereby submits the request for confidentiality under section 0.459(b).² The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313(h)(2)

² 47 C.F.R. § 0.459(b)



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January 2, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: Request for Confidentiality
Rate Floor - Valley Telephone Cooperative, Inc. (TX)
Study Area Code 442159**

Dear Ms. Dortch:

JSI, on behalf of its client, Valley Telephone Cooperative, Inc. ("Company"), hereby requests, pursuant to Section 0.459 of the Commission's rules,¹ withholding from public inspection of the above referenced document. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is line count data for each residential rate at Block 2, Column 5 of the Rate Floor Data form.
2. The Company is submitting the confidential data above pursuant to 47 C.F.R. 54.313(h)(2).
3. The information contained in the attachment includes market share data which would be useful to any competitor in determining how to compete with the Company in its offering of telecommunications
4. There is a high degree of competition within the Company's telecommunications marketplace.
5. With respect to identifying possible exposure to competitive harm, this information is provided on a study area-specific basis and could have economic value to potential competitors as it may provide competitors insight into the Company's market strategies and gain competitive advantage.

¹ 47 C.F.R. § 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of its line count data, this information is maintained confidentially by the Company and is not publicly disclosed.
7. The Company's line count data is not available to the public and has not been previously disclosed except to government agencies under a request for confidentiality.
8. The Company requests the line counts be treated as confidential as long as the data in question would provide a basis for competitors to gain insight into the business operations associated with the Company's telecommunications services.
9. Not Applicable

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to the line count data contained in the Company's Rate Floor Data report which is appropriately marked "Confidential-Not for Public Disclosure". Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall
Vice President
301-459-7590
jkuykendall@jsitel.com

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Rate Floor Data

RATE FLOOR DATA COLLECTION - OMB Control Number 3060-0986					
Block 1 - Contact Information					
ROW #	DATA ELEMENT		FORMAT OF REQUESTED DATA	RESPONSE	
1	Carrier Study Area Code		6 numeric digits	442159	
2	Carrier Study Area Name		alpha characters	VALLEY TELEPHONE CO-OP. INC. - TX	
3	Service Provider Identification Number		9 numeric digits	143002460	
4	Residential Local Service Charge Effective Date		mm/dd/yyyy	12/1/2018	
5	Contact Name		alpha characters	Dave Osborn	
6	Contact Telephone Number (include area code)		9 numeric digits	956-642-1124	
7	Sheet number		numeric digit(s)	1	
8	Total Number of Sheets		numeric digit(s)	1	
Block 2 - Residential Local Service Rates, Fees, and Line Counts					
	Column 1 Residential Local Service Charge	Column 2 State Subscriber Line Charge	Column 3 State Universal Service Fee	Column 4 Mandatory Extended Area Service Charge	Column 5 Loops
9	\$ 23.50	\$ -	\$ 0.78	\$ -	
10	\$ 11.75	\$ -	\$ 0.39	\$ -	
11					
12					
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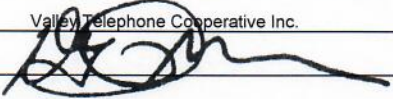
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Rate Floor

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING RATE FLOOR DATA ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Rate Floor Data

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the actual rate floor data reported ; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier	Valley Telephone Cooperative Inc.		
Signature of authorized officer			Date 12/26/2018
Printed name of authorized officer	Dave Osborn		
Title or position of authorized officer	CEO		
Telephone number of authorized officer: (956) 642 - 1124, ext. 124			
Study Area Code of Reporting Carrier	442159	Filing Due Date for this form (mm/dd/yyyy)	12/1/2018